



Monitoring and Continuous Improvement

Detecting Gaps and Strengthening Controls Over Time

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01 Why Monitoring Matters

Regulators expect a program that is tested, measured, and improving

1

THE PURPOSE

- Reinforce a culture of ethics across the business
- Confirm controls work in practice, not on paper
- Surface execution gaps early
- Turn findings into training and better process

2

WHAT REGULATORS EXPECT

- That a program is tested and evolving
- That monitoring is more than a paper exercise
- That findings drive real remediation
- That the program improves over time

02 Monitoring Versus Auditing

The two work together across the business

1

CONTINUOUS MONITORING

- Ongoing review of how controls operate
- Risk-based sampling across sites
- Close to the daily work of the business
- Designed to surface issues early

2

PERIODIC AUDITING

- Independent, point-in-time assurance
- Formal testing against standards
- Broader scope, less frequent
- Complements, not replaces, monitoring

03 A Structured Review

A disciplined review turns observations into closed action items

1

HOW A REVIEW WORKS

- Plan the scope using risk ratings
- Sample transactions and control execution
- Carry out fieldwork and document findings
- Report results and rate the risk

2

FROM FINDING TO FIX

- Assign clear owners and due dates
- Escalate high-risk findings promptly
- Track action items to closure
- Analyze themes across reviews

04

Sustaining Improvement

Targeted programs and metrics keep the program moving

1

MITIGATION PROGRAMS

- Targeted training where gaps appear
- Site visits and field support
- A shared library of proven controls
- Early engagement on new projects

2

MEASURING THE PROGRAM

- Key performance indicators and trends
- Findings and closure rates over time
- A periodic review of progress
- Regular reporting to the board

The Monitoring Cycle

Five stages that repeat and compound over time

1

Plan by Risk Scope reviews using risk ratings and prior findings.

2

Test and Sample Examine how controls operate in the field.

3

Report Findings Document results and rate each gap.

4

Remediate Assign owners, escalate, and track to closure.

5

Improve Feed themes back into the next plan.